

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SECURITIES AND EXCHANGE COMMISSION,

Civil Action No. _____

Plaintiff,

vs.

DECLARATION OF TRAVIS BRYANT

FRANCISCO ABELLAN,
VEGA STAR CAPITAL, SL,
EU EQUITY HOLDINGS INC.,
KLO FINANCIAL SERVICES INC.,
GENE HEW-LEN,
NXGEN HOLDINGS, INC., formerly known as
GHL TECHNOLOGIES, INC.,

Defendants,

and

APOLLO CORPORATION,
D&O INTERNATIONAL CORP.,
HALSTON CAPITAL LTD.,
INSIGHT MARKETING &
COMMUNICATIONS INC.,
LACROIX INTERNATIONAL
HOLDINGS LTD.,
MEDIA PACIFIC INC.,
MORTENSEN FINANCIAL LTD.,
OMNI CONSULTING SERVICES INC.,

Relief Defendants.

1 I, Travis Bryant, declare:

2 1. I am employed by Valley Offset Printing, Inc. ("Valley Offset") as Vice President. I
3 have been employed by Valley Offset since approximately March 1988. I work at Valley Offset's
4 offices located at 160 S. Sheridan Street, Valley Center, Kansas 67147. Unless otherwise specified, I
5 have personal knowledge of the facts stated herein, and could and would testify competently to them if
6 called to do so.

7 2. In Spring 2006, Valley Offset agreed to print and mail a project titled "The Street
8 Stock Report" for the customer Vega Star Capital SA ("Vega Star").

9 3. The individual known as "Frank Abellan" or "Frank Abel" was the only person with
10 whom Valley Offset communicated on behalf of the customer Vega Star regarding The Street Stock
11 Report project.

12 4. In connection with The Street Stock Report project, Valley Offset entered into a
13 Contract Agreement Between Valley Offset Printing, Inc. and Vega Star Capital SA, dated April 7,
14 2006. The Contract Agreement was signed by "Frank Abellan" for the customer Vega Star. Valley
15 Offset also entered into a Nondisclosure Agreement with Vega Star regarding The Street Stock
16 Report project. True and correct copies of the agreements are attached as **Exhibit A**. I signed the
17 agreements on behalf of Valley Offset.


18 5. As described by the Contract Agreement at Exhibit A, the customer provided Valley
19 Offset with the project art and mailing lists for producing and mailing The Street Stock Report.

20 6. The customer paid for The Street Stock Report project through wire transfers. By a
21 facsimile dated May 3, 2006, Valley Offset received a record of a wire transfer in the amount of
22 \$901,275.67 from an account at Credit Andorra in the name "Vega Star Capital" to an account held
23 by Valley Offset. A true and correct copy of the facsimile and wire transfer record is attached as
24 **Exhibit B**.

25 7. Attached as **Exhibit C** is a true and correct copy of a ledger sheet prepared by Valley
26 Offset showing the amounts paid by the customer Vega Star and the costs of The Street Stock Report
27 project.

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10. A true and correct copy of the brochure titled "The Street Stock Report" that was printed and mailed by Valley Offset in May 2006 is attached as **Exhibit I**.


Travis Bryant